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CARL T. JONES
CORPORATION

October 29, 1993

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Re: MM Docket No. 93-177

Dear Mr. Caton:

Enclosed is the original signature copy and nine additional copies of the Comments of Carl T. Jones Corporation in the Matter of an Inquiry into the Commission's Policies and Rules regarding AM Radio Service Directional Antenna Performance Verification. Pursuant to the procedures referred to in Paragraph 9 of the Notice, it is requested that each Commissioner receive a personal copy.

If there are questions regarding these Comments, please contact the undersigned.

Sincerely,

Herman E. Hurst, Jr.

HEH/law

Enclosures

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List ABCDE

Carl T. Jones Corporation
7901 Yarnwood Court, Springfield, Virginia 22153-2899 (703) 569-7704 Fax: (703) 569-6417

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CARL T. JONES CORPORATION

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OCT 29 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

An Inquiry into the Commission's	)	MM DOCKET NO. 93-177
Policies and Rules Regarding AM	)	RM-7594
Radio service Directional Antenna	)	
Performance Verification	)	

COMMENTS OF CARL T. JONES CORPORATION
FCC NOTICE OF INQUIRY

Carl T. Jones Corporation is a consulting communications engineering company. The firm, founded by John H. Barron in 1935, has provided engineering services to the broadcast industry for the past 58 years. Carl T. Jones Corporation (CTJC) herein submits its comment in the above captioned Notice of Inquiry (NOI).

CTJC supports amendment of the Rules and Regulations with regard to technical standards which incorporate improved and/or new technologies to reduce the risk of interference between AM stations, provided such changes can be shown to be cost effective, not placing undue economic burdens on licensees. Where amendment of technical regulations will provide AM station owners with reduced capital expenditures or operating costs, CTJC supports such changes in technical requirements provided there is no increase in the potential for increased interference between AM stations.

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The NOI correctly points out that many revisions to the 1939 Standard of Good Engineering Practice have occurred. Major changes over the past 50 years include:

1) An operator with a first class license no longer must monitor station technical operation continuously while the station is on air.
2) A one-year stability showing for a directional array is no longer required for stations having type-approved sampling systems.
3) Logging requirements have been substantially reduced, and automatic logging is permitted.

Improved equipment reliability, maintainability and mean time to failure has reduced the need for large engineering/technical staffs at broadcast stations resulting in cost savings. Engineering/technical costs have reduced over the past 40 to 50 years; unfortunately, so have revenues.

In 1947, gross revenues for the radio industry were $357,000,000[1]. Approximately 1,522 AM stations were on-air, resulting in an average per station gross revenue of $234,500. In 1991, gross radio revenues were estimated to be $8,600,000,000[2]. Therefore, in "real dollars," radio industry revenues have grown 275% over a 41-year period, while the number of commercial broadcast stations (9,500 in 1991) increased 624%. Assuming a prorated share based on listenership, the average AM station in 1991 had gross revenues of approximately $453,000, compared with a gross revenue of $2,056,000 (1991 dollars) in 1947[3].

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[1]The 1948 Radio Annual.

[2]Broadcasting and Cable Yearbook, 1993 edition.

[3]Based on a Consumer Price Index increase, 1950 to 1990, of 877%.

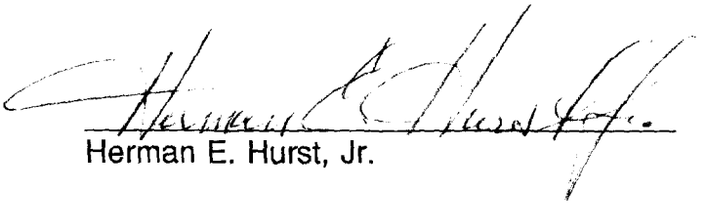
While the economic situation for many AM stations is indeed bleak, it does not result from the costs associated with insuring technical compliance with FCC Rules and Regulations. Due to improved test and monitoring equipment as well as analysis and data handling capabilities of computers, the associated costs have decreased when considered on a relative basis.

Today, the Commission is not enforcing regulations and procedures established in 1939. Rather, today's technical standards have indeed evolved with changes in technology. While antenna analysis methods have improved and enable a knowledgeable engineer to complete the verification effort in reduced time, the old adage "one measurement is worth a hundred calculations" is still true.

Based on this firm's experience in design, construction, adjustment, and proof-of-performance of AM directional antenna systems, we believe to substantially reduce current requirements for verification of antenna system performance, will serve only to shift the burden of insuring compliance with standards established to protect other stations from unacceptable interference from the permittee/licensee to the potentially affected station. The Commission would, in turn, be faced with constantly arbitrating matters concerning compliance rather than simply enforcing its technical standards.

Accordingly, CTJC recommends the Commission not initiate a Rulemaking Proceeding looking toward a major reduction in directional antenna system performance verification requirements.

DATED: October 29, 1993



Herman E. Hurst, Jr.